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Attorneys for Defendant, Air Line Pilots Association International

BY: STEVEN J. FRAM, ESQUIRE

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PATRICK BRADY, et al.,)
Plaintiffs,)
v.) Civil Action No. 02-2917 (JEI)
AIR LINE PILOTS ASSOCIATION,)
INTERNATIONAL,)
Defendant.)

**NOTICE OF MOTION OF DEFENDANT FOR JUDGMENT AS A MATTER OF LAW
PURSUANT TO FED. R. CIV. P. 50(b)**

To: Lisa J. Rodriguez, Esquire
Trujillo Rodriguez & Richards, LLC
258 Kings Highway E.
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Suite 700
St. Louis, MO 63105

PLEASE TAKE NOTICE that on Tuesday, September 6, 2011, at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel for Defendant, the Air Line Pilots

Association International, shall move before the United States District Court for the District of New Jersey, at the U. S. Courthouse and Post Office Building in Camden, New Jersey, for an Order granting judgment in favor of ALPA, and dismissing this action with prejudice, on the grounds that, notwithstanding the jury's liability verdict in this case, ALPA is entitled to judgment as a matter of law.

In support of this motion, the undersigned shall rely upon the brief being submitted with this Notice of Motion, the accompanying Declaration of Counsel and the record herein. A proposed form of Order is also being submitted.

Oral argument is requested.

Respectfully submitted,

ARCHER & GREINER
A Professional Corporation

By: /s/ Steven J. Fram
STEVEN J. FRAM, ESQUIRE

Pro Hac Vice:

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Dated: August 10, 2011.
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